

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

**S.H., individually, and on behalf
of all others similarly situated,**

Plaintiff,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE,

Defendant.

/

**DECLARATION OF JULIE C. ERICKSON IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT**

I, Julie C. Erickson, declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct:

1. I am over twenty-one years of age and am competent in all respects to give this Declaration. This Declaration is given freely and voluntarily. I have personal knowledge of the matters herein and could, and would, testify competently thereto under penalty of perjury.
2. I am counsel for Plaintiff S.H. in the above-referenced case. I am a licensed attorney in good standing in the State of California (CABN 293111) and admitted to appear *pro hac vice* in this District.
3. The Parties mediated this case on December 9, 2024. ECF 509-1. While the Parties made significant progress that day, they did not reach an agreement. The Parties continued their negotiations over the next two months, finally executing a term sheet on February 13, 2025

4. On February 13, 2025, the City Commission for the City of Johnson City voted unanimously in favor of the proposed settlement, understanding that ultimate approval authority is vested with the Court.
5. Following the Commission's approval, counsel for Plaintiff began drafting the settlement agreement, which they provided to counsel for the City on March 11, 2025.
6. On March 4, 2025, the Court set a deadline of March 24, 2025 by which the parties were to file a Motion for Preliminary Approval of Class Action Settlement ("Motion"). ECF 506. In that order, the Court stated the parties may seek an extension of that deadline for good cause.
7. On March 24, 2025, the Court granted an extension for Plaintiff to file the Motion on May 5, 2025 and stayed all other deadlines pending the settlement approval process, ECF 510.
8. Several rounds of drafts have been exchanged, each of which have needed close review and client sign-off. Additionally, counsel have been coordinating with the proposed settlement administrator regarding various logistical procedures. Based on my experience and given the scope of the remaining work and complexities of this litigation, I believe the requested 14-day extension is reasonable and appropriate.
9. There is no evidence of delay by the Parties or their counsel. To the contrary, Plaintiff's counsel have advanced this litigation at a rapid pace and have a duty to seek court approval of the settlement (and secure payment to settlement class members) as expeditiously as possible.

Respectfully submitted this 2nd day of May 2025,

/s/ Julie C. Erickson
Julie C. Erickson

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on May 2, 2025 to counsel of record:

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